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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,) CASE NO. MJ21-5210
)
Plaintiff,)
)
v.) **COMPLAINT for VIOLATION**
) **18 U.S.C. § 2252(a)(4)(B), (b)(2)**
)
WILLIAM ALEXANDER CRISOLO)
)
Defendant.)

BEFORE, the Honorable J. Richard Creatura, United States Magistrate Judge, U.S.
Courthouse, Tacoma, Washington.

COUNT 1

(Possession of Child Pornography)

Beginning on a date unknown but continuing until in or about October 2021, in
Pierce County, within the Western District of Washington, and elsewhere, WILLIAM
ALEXANDER CRISOLO knowingly possessed matter that contained visual depictions,
the production of which involved the use of minors engaging in sexually explicit conduct
and the visual depictions were of such conduct, that had been mailed and shipped and
transported in and affecting interstate and foreign commerce by any means, including by
computer, and which had been produced using materials that had been mailed and
shipped and transported in and affecting interstate and foreign commerce by any means,

COMPLIANT CRISOLO / - 1

UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
(206) 553-7970

1 including by computer, and the depictions of child pornography involved included
2 images of a prepubescent minor and a minor who had not attained 12 years of age.

3 All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

4 And the Complainant states that this Complaint is based on the following
5 information:

6 I, Ly Tran, being first duly sworn on oath, depose and say:

7 **I. INTRODUCTION**

8 1. I am an investigative or law enforcement officer of the United States within
9 the meaning of Title 18, United States Code, Section 2510(7). I am currently employed
10 as a Special Agent with the U.S. Department of Homeland Security (DHS), Homeland
11 Security Investigations (HSI). I have been a federal law enforcement officer for over 16
12 years. Prior to my employment with HSI, I was a Parole Officer for the Washington
13 State Department of Corrections for approximately four years.

14 2. I have participated in investigations involving human trafficking, financial
15 crimes, cybercrimes, child exploitation, narcotics, and murder for hire. While assigned to
16 the HSI Attaché office in Vietnam, I conducted numerous investigations involving the
17 sexual exploitation of children and interstate / international travel for illegal sexual
18 activity involving minors. During the course of these investigations, I have reviewed
19 child exploitation materials.

20 3. I am currently assigned as a Special Agent with HSI Lakewood, where my
21 duties include child exploitation and child pornography investigations. I have
22 participated in numerous child exploitation or child pornography investigations and have
23 worked extensively with other investigators involved in these types of investigations.

24 4. As further detailed below, based on my investigation and the investigation
25 of other law enforcement officers, I believe there is probable cause to conclude that
26 WILLIAM ALEXANDER CRISOLO knowingly possessed child pornography in
27 violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).
28

1 5. The facts set forth in this complaint are based on my own personal
2 knowledge; knowledge obtained from other individuals during my participation in this
3 investigation, including other law enforcement officers; review of documents and records
4 related to this investigation; communications with others who have personal knowledge
5 of the events and circumstances described herein; and information gained through my
6 training and experience. Because this complaint is offered for the limited purpose of
7 establishing probable cause, I have not set forth every fact known to me based on this
8 investigation. Rather, I provided only those facts that I believe necessary to establish
9 probable cause that WILLIAM CRISOLO committed the offense charged in this
10 complaint.

11 6. This complaint is being presented electronically pursuant to Local Criminal
12 Rule CrR 41(d)(3).

13 II. SUMMARY OF INVESTIGATION

14 7. In August 2021, HSI Cyber Crimes Center (C3) Child Exploitation
15 Investigations Unit (CEIU) located in Fairfax, Virginia received an investigative referral
16 from a foreign law enforcement agency. HSI C3 CEIU analyzed the investigative lead
17 and disseminated to HSI Seattle. The investigative referral indicated that a subject with
18 the Kik user named will_solo, subsequently identified as WILLIAM ALEXANDER
19 CRISOLO was sending messages indicating that he was actively sexually abusing two
20 different minors and that he had filmed the abuse.

21 8. On October 1, 2021, pursuant to a search warrant issued that same day by
22 United States Magistrate Judge J. Richard Creatura, I led the law enforcement team
23 during a search of CRISOLO's Tacoma residence. Upon entering the residence, I
24 contacted WILLIAM ALEXANDER CRISOLO and obtained a black iPhone from his
25 front pocket. He agreed to speak with us.

26 9. HSI Special Agent (SA) Jason Montgomery and I then interviewed
27 CRISOLO. At the start of the interview, I advised him of his constitutional rights, and I
28 confirmed that he both understood them and was still willing to speak with us. In the

1 subsequent interview, CRISOLO admitted that he used Kik to chat and trade child sexual
2 assault materials with other users (CSAM).

3 10. Kik is a messaging app previously based out of Canada now owned and
4 operated by MEDIALAB.AI INC. located in Santa Monica, California. Based on my
5 training and experience, I know that Kik allows its users to communicate with one
6 another across many different countries. It is available on multiple different phone and
7 computer operating systems.

8 11. CRISOLO admitted that he started viewing CSAM in the late nineties.
9 Initially, he deleted CSAM after each viewing, but he eventually started saving the
10 images. CRISOLO told me that he had CSAM on his computer, a black tower, located in
11 the office of the residence. CRISOLO provided law enforcement his login and password
12 for both the computer and the black iPhone. He explained to me that he stored the CSAM
13 in a virtual computer, which was within his physical computer. Due to the complexity of
14 his technological system that was beyond my technological experience, I requested HSI
15 Computer Forensic Special Agent Gabriel Stajduhar to join the interview. CRISOLO
16 explained how his virtual computer worked to agent Stajduhar.

17 12. HSI computer forensic specialists found more than 100 CSAM videos and
18 pictures on CRISOLO's black tower computer. I describe three representative examples
19 below:

20 **FILE 1:** Video title "aDeep" was approximately 50 second long. It depicts a child,
21 approximately three years old, laying face down on a bed. A naked adult white
22 male, without his face showing, violently penetrated the child. The male says "oh
23 yeah" several times while squeezing the child's buttocks and lower back.

24 **FILE 2:** Video title "IMG_7366" was approximately 12 second long. It depicts an
25 infant, laying face up on a bed sucking/licking a white male penis. Toward the end
26 of the video, the infant cried and attempts to move his/her head away from the
27 penis.
28

1 **FILE 3:** This is a photograph depicting a child laying face up on the edge of a bed
2 with her shirt pulled up above her chest, revealing her naked body from chest to
3 knee. There is a white male standing between her legs with his penis inserted into
4 her vagina. The body of the child had not developed breasts or pubic hair. She
5 appeared to be approximately six years old.

6 13. At first, CRISOLO denied having any CSAM on his black iPhone. Later he
7 admitted that he may have some pictures of CSAM that people sent to him. He told me
8 that, in addition to Kik, he used WICKR application to chat and trade CSAM.

9 14. WICKR is an American software company based in New York City that
10 developed several secure messaging apps that allow its users to send encrypted and
11 content-expiring messages including photos, videos, and file attachments. Based on my
12 training and experience, I know that WICKR has users across the globe. Its software is
13 available for the iOS, Anroid, Mac, Windows, and Linux operating systems.

14 15. CRISOLO admitted that he had nude pictures of his daughter, hereinafter
15 referred as E.C. CRISOLO provided the agents directions to the location of the pictures
16 on his black iPhone. On-site triage of his black iPhone, revealed numerous images of
17 CSAM, including nude pictures of E.C. and E.C.'s friend, hereinafter referred as A.G.

18 16. I reviewed the first nude picture, suspected to be E.C. The picture was
19 taken inside E.C.'s bedroom. It appeared the bed sheet was lifted to reveal a picture of
20 her naked body. E.C. was nude from the waist down and the focus of the picture was her
21 vagina. The bedspread in the picture was the same bedspread inside her bedroom when
22 law enforcement searched the residence.

23 17. I reviewed a second nude picture, suspected to be E.C. The picture was
24 taken in the kitchen/nook area of CRISOLO's current residence. E.C. was kneeling on a
25 chair and wearing an open blouse. The focus of the picture was E.C.'s vagina. There were
26 several chairs inside the house at the time of the search identical to the chair in the
27 picture. Based on the angle of the picture, I believe it was taken from underneath the
28 dinner table.

18. Computer Forensic Special Agent Alan Heng located one picture of E.C. and A.G. together. The picture was taken inside the downstairs restroom. The picture depicts E.C. in her underwear and A.G. in a blue dress standing on top of a stool. The stool in the picture was the same stool inside the downstairs restroom at the time of warrant service. When agents showed this picture to E.C.'s mother, hereinafter referred as M.C., she identified both E.C. and A.G. According to M.C., in June and July 2021, A.G. spent lots of time at CRISOLO'S residence because her mother was pregnant at the time. A.G. slept at the residence overnight on at least two times.

19. CRISOLO later admitted that he touched E.C.'s friend, believed to be A.G., on one occasion when she came over to play with E.C. He stated that he touched her vagina outside of her underwear while he rocked her on his lap.

III. CONCLUSION

20. Based on the above facts, I respectfully submit that there is probable cause to believe that WILLIAM ALEXANDER CRISOLO did knowingly and unlawfully possess child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B), (b)(2).

LY C TRAN

Digitally signed by LY C TRAN
Date: 2021.10.03 09:56:06
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Ly Tran, Complainant,
Special Agent
Homeland Security Investigations

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 3rd day of October, 2021.


J. RICHARD CREATURA
United States Magistrate Judge